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Congress of the United States Washington. **BC** 20515

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May 4,2007

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Federal Communications Company and Office of the Secretary

The Honorable Kevin J. Martin Chairman Federal Communications Commission **445** 12th Street, S.W. Washington, D.C. 20554

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Dear Mr. Chairman:

We axe writing to request that the Federal Communications Commission (Commission) adhere to its February 18,2008 sunset date for the end of the Commission's requirement that commercial mobile services provide analog service to cellular telephones. We believe the analog service rule is no longer necessary, and continuation of this requirement would undermine spectral efficiency and impose additional costs, especially on rural wireless carriers.

The Commission set the February 18,2008 sunset date in 2002, after finding that the competitive state of mobile wireless service, nationwide coverage achieved by carriers and clear consumer demand obviated the need to maintain the analog requirement. As part of that decision, the Commission established a reasonable and achievable multi-year path toward the sunset of the analog requirement. Customers and carriers have had ample time to prepare for the transition and take action. During the past five years, wireless carriers have been transitioning their networks and customers in anticipation of the end of the analog requirement. Because of the expectation that the sunset would be implemented, wireless camers have relatively few remaining analog customers, and the cost of continuing to operate an analog network for such few customers is, in many cases, substantial.

In addition, the continued provision of analog service prevents wireless carriers from using that spectrum more efficiently and effectively for wireless broadband services. One of the Commission's strategic goals is that "[a]ll Americans should have affordable access to robust and reliable broadband products and services." Permitting wireless carriers to reallocate spectrum currently used for analog service to the provision of broadband services will help the Commission achieve that goal.

Facilitating a more complete transition to digital service will pay dividends for public safety, as well. Digital phones give consumers access to state-of-the-art **E91** I location capabilities, while old analog phones do not. Digital handsets also can offer customers better voice quality, longer hattery life, and GPS-navigation capabilities. Analog phones offer none of these advantages.

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The Honorable Kevin J. Martin Page **2**

We understand that some interested parties have asked the Commission to revisit its previous determination and extend the analog service requirement. We believe the existing transition has provided an adequate amount of time to prepare for the end of analog cellular service. A delay of the sunset of the analog requirement would impose unnecessarycosts on consumers by depnving wireless carriers of the ability to maximize spectral efficiencies that could permit the roil-out of new, advanced services. We urge the Commission not to extend the current sunset date.

Thank you lor your attention to this matter

Sincerely,

Jay make

Gene Green

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July July

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The Honorable Kevin J. Martin Page 3

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